

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	
Plaintiff,	)	
	)	No. 07 CR 843-6
v.	)	
	)	Hon. Judge Joan H. Lefkow
SENECCA WILLIAMS,	)	Hon. Magistrate Judge Sidney Schenkier
Defendant.	)	

**MOTION TO SEVER**

Now comes the Defendant, SENECCA WILLIAMS, by and through his attorney, Ralph J. Schindler, Jr., and does move this court to Sever Defendant SENECCA WILLIAMS from his co-defendants. In support of such Motion, Defendant does state the following:

1. Defendant believes that certain co-defendants may possess certain exculpatory evidence relative to SENECCA WILLIAMS' involvement in the alleged conspiracy. Specifically, it is believed that certain co-defendants could testify relative to the independence of Mr. WILLIAMS from other alleged members of the conspiracy. It is believed that such individuals might indicate that, if in fact Mr. WILLIAMS was involved in the alleged conspiracy, his involvement was independent of and separate from the group and other exculpatory items.

2. At trial of this matter, Mr. WILLIAMS may seek to have his co-defendants testify in his defense.

3. Likewise, it is believed that certain co-defendants may wish to have Mr. WILLIAMS testify in their defense.

4. Should either party be called, such party may be forced to claim his Fifth Amendment rights before the jury.

5. It is believed that Mr. WILLIAMS' defense of being an independent operator may be difficult for a jury to discern when barraged by allegations relative to the co-defendant's actions. Accordingly, Mr. WILLIAMS' defense will be highly prejudiced by the joinder with his co-defendants.

Based on the above, it is respectfully requested that Defendant SENECCA WILLIAMS be severed for purposes of the trial of this matter.

Respectfully Submitted,

/s/ Ralph J. Schindler, Jr.

Ralph J. Schindler, Jr.  
Attorney for SENECCA WILLIAMS

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